

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

SHANNON LEWANDOWSKI

Plaintiff,

v.

Case No: 16-CV-1089

CITY OF MILWAUKEE

Defendant.

**PLAINTIFF'S RULE 7(h) EXPEDITED, NON-DISPOSITIVE MOTION
TO EXTEND DISCOVERY AND DISPOSITIVE MOTION DEADLINES**

Plaintiff hereby moves, pursuant to Civ. L. R. 7(h), to extend the time for discovery and dispositive motions in this case. The discovery deadline is today, October 31, 2018, and the dispositive motion deadline is currently November 23, 2018.

The parties have largely completed written discovery, subject to any follow-up required on either side, but Plaintiff's counsel has been unable to schedule depositions in time to meet the current discovery deadline due to personal matters beyond her control. Discovery over the summer was greatly impacted by childcare for Plaintiff's counsel's special needs 9-year-old boy falling through, which required counsel to stay home from work every other week from the end of May through the start of school in mid-September to care for him full-time during her weeks of custody. Then, just as the parties were ramping up discovery and completing written discovery in mid-October, Plaintiff's counsel's father became gravely ill with kidney failure and

a subsequent metastatic cancer diagnosis that took her away from work to the hospital for nearly two weeks straight. See the Heins Declaration, attached.

These personal crises have been resolved now, but the impact remains, and Plaintiff's counsel requests another 45 days to complete depositions of various officers and command staff within the Milwaukee Police Department and Fire & Police Commission. Scheduling is anticipated to be difficult, which is why counsel requests 45 days instead of 30 for these depositions.

Plaintiff thus requests that the discovery deadline be extended to December 14, 2018 and the dispositive motion to extended to January 31, 2019.

Dated this 31st day of October, 2018.

HEINS EMPLOYMENT LAW PRACTICE LLC
Counsel for the Plaintiff

s/ Janet L. Heins
Janet L. Heins, State Bar No. 1000677

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